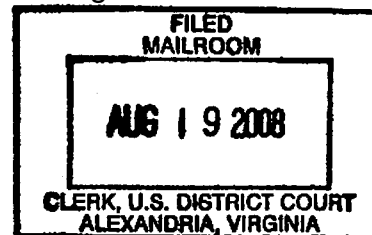


**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**



CHEN BAO SHUI, an individual, and  
<CITYBANK.ORG>,

Defendants.

v.

CITIGROUP INC., a New York  
corporation,

Plaintiff

Case No. **1:2008cv00727**

Excuse my unprofessional attempt of defense, it would not make sense to hire a lawyer in the USA for a domain with market value of few hundreds US dollars.

1

Defendant bought this domain in a portfolio deal, based on traffic and revenue, defendant never before heard of any "CITI bank" as in China they are not much popular - they focus on rich clients, and use name "Hua Qi" (Flower Flag).

2

Plaintiff is intentionally omitting fact that he tried to get citybank.org via UDRP and has been DENIED  
<http://domains.adrforum.com/domains/decisions/1142607.htm>

3

a.

Plaintiff is using for his main business CITI.com  
so according to plaintiff people make three errors while typing:  
CITY instead of CITI, add a word BANK and instead of .com they type .org ?

b.

There exist many banks which use legitimately CITYBANK in their domainname, for example  
thecitybank.com  
citybankwa.com  
citybankonline.com  
city-bank.com  
mycitybank.com  
capcitybank.com  
Etc.

c.

In English language CITY BANK is the correct spelling, CITI BANK is some alternative spelling, yet owner of brand in alternative spelling is trying to take away a domain name with correct spelling ?

d.

CITI does not even own citybank.com !

Therefore according 1125(d)(2)(A) this should be dismissed as plaintiff has not established rights to citybank.org

6

Public Interest Registry (the registry of .org extension) is incorporated in Pennsylvania, they have only offices in Virginia, plaintiff must have known that:

<http://www.isoc.org/isoc/general/trustees/2003reports/pir-art.shtml>

7

Citybank.org has been registered in 1997 (as per whois search), now bringing action after 11 years should constitute "laches"

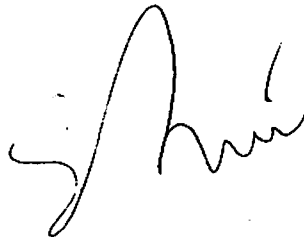
8

As per plaintiffs "exhibits" - it is autooptimized parked page, where domain owners can park pages which they do not have current use for (park for later development). And these lawyers know, that if they searched several times for "Citi credit card" the page will autooptimize. So this is in fact no proof that people are looking for CITI.com as it can be easily manipulated.

I actually have proof it was manipulated: on their printscreens this search term is on 2nd position and now its on 5th position, because they would have to keep manipulate it every week, if nobody clicks, the search term automatically goes onto lower position.

9

citybank.org is not anymore owned by Mr. Shui, now is owned by Mr. Bhairab Bishwakarma as per whois: <http://www.pir.org/index.php?mode=whois>

A handwritten signature in black ink, appearing to be 'Shui', is located at the bottom center of the page.